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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

KIM MICHELE PADILLA,)	Civil No. 4:16-cv-04135-KAW
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR A SECOND EXTENSION OF TIME
v.)	FOR DEFENDANT TO FILE HER
)	MOTION FOR SUMMARY JUDGMENT
NANCY A. BERRYHILL,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and with the approval of the Court, that Defendant shall have a second extension of time of 30 days to file her motion for summary judgment. Defendant has reviewed the contentions in Plaintiff's MSJ and respectfully requests this additional time to consider the possibility to voluntarily remand in lieu of further litigation.

Stipulation to Extend Def.'s MSJ

1 The new due date for Defendant's motion for summary judgment will be Monday,
2 January 15, 2018.

3
4 Respectfully submitted,

5 Date: December 15, 2017

By: /s/ Lisa Susan Douglass*
LISA SUSAN DOUGLASS
* By email authorization on Dec. 14, 2017
Attorney for Plaintiff

8 Date: December 15, 2017

BRIAN J. STRETCH
United States Attorney

10 By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Special Assistant United States Attorney
Attorneys for Defendant

13 Of Counsel
14 Jeffrey Chen
15 Assistant Regional Counsel
16 Social Security Administration

20 ORDER

22 APPROVED AND SO ORDERED:

23 DATED: 12/19/17


HONORABLE KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE

28 Stipulation to Extend Def.'s MSJ